

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT COURT OF ALABAMA
EASTERN DIVISION**

LORI L. FAWBUSH,)
)
Plaintiff,)
)
) Civil Action No.: CV-3:07-cv-204-WKW
ALLISON M. LUSARDI, et al.)
)
Defendants.)

SUPPLEMENT TO NOTICE OF REMOVAL

Comes now Defendant Allison M. Lusardi ("Lusardi"), and hereby supplements her Notice of Removal as follows:

1. Attached hereto as **Exhibit 1** is the affidavit of Ronald G. Davenport, which provides further evidence that the amount in controversy is in excess of \$75,000.
2. Attached hereto as **Exhibit 2** is the Corporate Detail from the Alabama Secretary of State's office concerning the domicile of unserved Defendant Travelers Casualty and Surety Company.

WHEREFORE, Defendant Allison M. Lusardi prays that this Court will take jurisdiction over this civil action.

/s/ Ronald G. Davenport
RONALD G. DAVENPORT (DAV044)
R. MAC FREEMAN, JR. (FRE046)
Attorney for Defendant Allison M. Lusardi

OF COUNSEL:

Rushton, Stakely, Johnston & Garrett, P.A.
P. O. Box 270
Montgomery, AL 36101
(334) 206-3100
(334) 481-0804 (fax)
rgd@rsjg.com

CERTIFICATE OF SERVICE

I hereby certify that on March 9, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Tutt Barrett, Esq.
Dean & Barrett
P.O. Box 231
Opelika, AL 36803-0231

/s/ Ronald G. Davenport
OF COUNSEL

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AFFIDAVIT OF RONALD G. DAVENPORT

STATE OF ALABAMA
MONTGOMERY COUNTY

This day, personally appeared before me, the undersigned, **Ronald G. Davenport**, who being by me first duly sworn, deposes and says as follows:

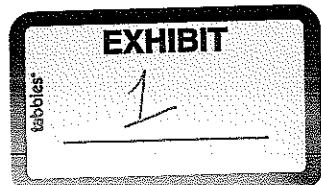
My name is Ronald G. Davenport and I am an attorney licensed to practice law in the state of Alabama and am admitted to practice in the United States District Court for the Middle District of Alabama. I am one of the attorneys for the defendant, Allison M. Lusardi, in the above suit. I talked with Tutt Barrett, the plaintiff's attorney, on March 5, 2007 and inquired as to whether he thought the value of the plaintiff's claim was greater than \$75,000. He told me that, while he did not have the file before him, he thought the medicals alone were around \$25,000 and in his opinion he thought the value of the case was greater than \$75,000.

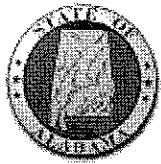
I understand that this affidavit will be used in support of a Notice of Removal which I have filed in the above case.


RONALD G. DAVENPORT

SWORN TO AND SUBSCRIBED before me this 9th day of March, 2007.


NOTARY PUBLIC
MY COMMISSION EXPIRES: 10-11-08





CORPORATE DETAILS

Office of the Secretary of State
State of Alabama

INITIATE NEW BROWSE

Corporation

FIC 850-114

Legal Name: Travelers Casualty and Surety Company

State Of Inc: Connecticut

Qualified.: 12-29-1964

Reg Agent.: COMMISSIONER OF INSURANCE

Prin Address: 151 FARMINGON AVE.
HARIFORD, CT

Nat Of Bus.: FOR CORPORATE DETAILS CONTACT THE INSURANCE DEPT (334) 269-3550

TRANSACTION LIST

2006

ANNUAL REPORTS

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